

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION, :  
: Plaintiff, :  
: :  
: v. : 12 Civ. 8167 (RJS)  
: :  
LEE COLE, et al., : ECF Case  
: :  
: Defendants. :  
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**NOTICE OF PLAINTIFF'S MOTION AND MOTION FOR SUMMARY JUDGMENT  
AGAINST DEFENDANT TIMOTHY QUINTANILLA**

Pursuant to Federal Rule of Civil Procedure 56(a), the Securities and Exchange Commission will and hereby does move the Court for summary judgment as to liability on its claims against Timothy Quintanilla for primary violations of Section 17(a) of the Securities Act of 1933 [15 U.S.C. § 77q(a)], Section 10(b) of the Securities Exchange Act of 1934 [15 U.S.C. § 78j(b)], and Exchange Act Rule 10b-5 [17 C.F.R. 240.10b-5], and for aiding and abetting violations of Section 10(b) of the Exchange Act, Sections 10A(a)(1) and 10A(b)(1) of the Exchange Act [15 U.S.C. §§ 78j-1(a)(1) and 78j-1(b)(1)], and Exchange Act Rule 10b-5, pursuant to Section 20(e) of the Exchange Act [15 U.S.C. § 78t(e)]. The reasons supporting this motion are stated in the accompanying memorandum of law, declaration, and statement of undisputed facts.

Executed on April 29, 2014.

Respectfully submitted,

*/s/ Aaron P. Arnzen*  
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